

## COMMENTS

Comments received for CHA Draft Report (*December 21, 2009*, CHA Project No. 20085.7000.1510) for the Assessment of Dam Safety of Coal Combustion Surface Impoundments American Electric Power – Big Sandy Generating Station, Louisa, KY. Comments include;

- EPA comments – February 3, 2010;
- KY DNR received on January 28, 2010; and
- AEP comments - None.



FW Comments on Draft Reports AEP's Big Sandy Conesville Muskingum 02-03-10  
From: Harris IV, Warren  
Sent: Wednesday, February 03, 2010 2:21 PM  
To: Everleth, Jennifer; Adnams, Katy  
Subject: FW: Comments on Draft Reports: AEP's Big Sandy, Conesville, Muskingum

Attachments: Comments on Big Sandy.doc; State Comments on Ash Pond inspections located within Kentucky.doc; Comments on Conesville.doc; Ohio State Comments on Draft Reports.pdf; Comments on Muskingum.doc; AEP Comments on Draft Report - Muskingum River Plant.pdf

-----Original Message-----

From: Kohler, James@epamail.epa.gov [mailto:Kohler, James@epamail.epa.gov]  
Sent: Wednesday, February 03, 2010 11:00 AM  
To: dennis.a.miller@mco.com; Hargraves, Malcolm; Harris IV, Warren  
Cc: Hoffman, Stephen@epamail.epa.gov  
Subject: Comments on Draft Reports: AEP's Big Sandy, Conesville, Muskingum

Dennis/CHA:

EPA/state/company comments are attached, please address as appropriate.  
As before: we will be including these comments as a separate document and posting to the web along with the draft and final reports.

Please note: changes do not need to be made to your recommendations or any other parts of the report based on these comments unless you feel the additional information provided in the comments warrants a change.

If there is any question about how to address a comment, please inform Steve and myself and we can discuss.

Thank you!

Jim

(See attached file: Comments on Big Sandy.doc)(See attached file: State Comments on Ash Pond inspections located within Kentucky.doc)(See attached file: Comments on Conesville.doc)(See attached file: Ohio State Comments on Draft Reports.pdf)(See attached file: Comments on Muskingum.doc)(See attached file: AEP Comments on Draft Report - Muskingum River Plant.pdf)

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Jim Kohler, P. E.  
Environmental Engineer  
LT, U.S. Public Health Service  
U.S. Environmental Protection Agency  
Office of Resource Conservation and Recovery  
Phone: 703-347-8953  
Fax: 703-308-0514  
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Final Report  
Assessment of Dam Safety of Coal Combustion Surface Impoundments  
American Electric Power – Big Sandy Generating Station  
Louisa, KY

**Comments Received from the EPA**  
**In Response to CHA Draft Report dated December 21, 2009**  
*Email Received February 3, 2010*

CHA Project No. 20085.7000.1510



### Comments

EPA HQ – Both checklists in Appendix A indicate a unit name of “Bottom Ash Complex”. The second checklist should be for the Fly Ash Pond.

EPA Region – None.

State – See attachment from email dated January 28, 2010.

Company – None.

Final Report  
Assessment of Dam Safety of Coal Combustion Surface Impoundments  
American Electric Power – Big Sandy Generating Station  
Louisa, KY

**Comments Received from KY DNR**  
**In Response to CHA Draft Report dated December 21, 2009**  
*Email dated January 28, 2010*

CHA Project No. 20085.7000.1510



From: "Phelps, Scott (EEC)" <Scott.Phelps@ky.gov>  
To: James Kohler/DC/USEPA/US@EPA  
Date: 01/28/2010 09:20 AM  
Subject: Comments from Kentucky on Ash Pond Reports

James

I am attaching our comments on the draft reports that were sent to me. It is my understanding that Gary Wells with our office has already supplied comments on the LG&E Mill Creek impoundment. Let me know if you need further clarification or anything else.

**Scott Phelps P.E., C.F.M., Supervisor  
Dam Safety and Floodplain  
Compliance Section  
Water Infrastructure Branch**

Attachment:

Comments on Ash Pond inspections located within Kentucky.

General: Kentucky would like to correct a statement made in several of the draft reports. Many of the reports state that Kentucky does not have standards for dam stability. This statement is incorrect and should be corrected in all reports. The standards are clearly stated in "Guidelines for the Geotechnical Investigation and Analysis of Existing Earth Dams". This publication is located on our website and available for download. The necessary factors of safety are found on page 25. The web address for the document is: <http://www.water.ky.gov/damsafety/dsdownloads/>

**E.W. Brown Aux Pond.**

The statement that the ash pond has a permit number KYDW Permit 1213 is incorrect. The Kentucky Division of Water has assigned dam ID number KY1213 to this structure. This is the number that the structure can be found under in the NID.

**E.W. Brown Main Pond**

3.2 Summary of Local, State and Federal Environmental Permits:

The statement that the ash pond has a permit number KYDW Permit 0737 is incorrect. The Kentucky Division of Water has assigned dam ID number KY0737 to this structure. This is the number that the structure can be found under in the NID.

**Kentucky Utilities Ghent Power Plant**

1.2.1 There is no mention of permits issued by the Kentucky Division of Water for Construction of ATB 2 or the Gypsum Stacking Facility.

### 3.3 Structural Adequacy & Stability

The statement that Kentucky regulations and guidelines for dam safety do not provide specific factors of safety for slope stability is incorrect. The standards are clearly stated in “Guidelines for the Geotechnical Investigation and Analysis of Existing Earth Dams”. This publication is located on our website and available for download. The necessary factors of safety are found on page 25. The web address for the document is: <http://www.water.ky.gov/damsafety/dsdownloads/>

## **LG&E Cane Run**

The map on page 9 indicates the wrong plant and places the plant in Indiana.

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## 4.1 Acknowledement of Management Unit Condition

## **Big Rivers Coleman Plant**

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Big Rivers Reid, Green, HMPL

No comments from Kentucky Division of Water.

## **American Electric Power Big Sandy Generating Station**

### **P.1 Company or Organization**

The Kentucky Department of Natural Resources is a different agency than the Department for Environmental Protection. DEP is the correct agency for Scott Phelps.

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*None Received*

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